



**CERTIFIED MAIL # 7017 2680 0000 8846 0027**

February 13, 2019

Alaska Department of Environmental Conservation  
Air Permits Program  
610 University Avenue  
Fairbanks, Alaska 99709-3643  
Attn: Compliance Technician

BP Exploration (Alaska) Inc.  
900 East Benson Boulevard  
P.O. Box 196612  
Anchorage, Alaska 99519-6612  
(907) 561-5111

**ADEC AIR QUALITY**

**FEB 19 2019**

**FAIRBANKS**

**ORIGINAL**

Fourth Quarter 2018 Facility Operating Reports  
Required by AQC Permits to Operate for BPXA Operated Facilities

Dear Compliance Technician:

In accordance with the Air Quality Control Permits to Operate for the BPXA Operated Facilities, please find attached the following reports:

<u>Facility</u>	<u>Permit No.</u>	<u>Required Report</u>
Gathering Center # 1 (GC-1)  ✓	AQC Operating Permit No. 182TVP01, Revision 1 As required by Condition 5.1.d, copies of the records of fuel gas sulfur content are attached, if applicable. As required by Condition 11.3, copies of the records of flue gas content of CO and O <sub>2</sub> are attached, if applicable. As required by Condition 28.1 and 34.4, copies of visible emission observation results are attached, if applicable. As required by Condition 49.5, a public complaint log is attached, if applicable. As required by Condition 67.1, copies of any NSPS and NESHAPs reports are attached, if applicable.	4Q 2018 Facility Operating Report
Gathering Center # 2 (GC-2)	AQC Operating Permit No. 183TVP01, Revision 2, and AQ0183MSS01 As required by Condition 5.1.d, copies of the records of fuel gas sulfur content are attached, if applicable. As required by Condition 25.1 and 31.4, copies of visible emission observation results are attached, if applicable. As required by Condition 46.5, a public complaint log is attached, if applicable. As required by Condition 64.1, copies of any NSPS and NESHAPs reports are attached, if applicable.	4Q 2018 Facility Operating Report

✓	Central Gas Facility (CGF)	AQC Construction/Operating Permit No. 270TVP01 and 270CPT04	4Q 2018 Facility Operating Report
		<p>As required by Condition 5.1.d, copies of the records of fuel gas sulfur content are attached, if applicable.</p> <p>As required by Condition 25.7, copies of Excess Emissions and Monitoring System Performance Reports are attached, if applicable.</p> <p>As required by Condition 41.1 and 45.4, copies of visible emission observation results are attached, if applicable.</p> <p>As required by Condition 63.5, a public complaint log is included, if applicable.</p> <p>As required by Condition 82.1, copies of any NSPS and NESHAPs reports are attached, if applicable.</p>	
✓	Seawater Injection Plant (SIP)	AQC Operating Permit No. 170TVP02	4Q 2018 Facility Operating Report
		<p>As required by Conditions 8.3b and 26.4, copies of the records of fuel sulfur content are attached, if applicable.</p> <p>As required by Conditions 4.1, 7.3, 11.2b(i), 12.2b(i) and 60.3, copies of visible emission observation results are attached, if applicable.</p> <p>As required by Condition 37.4, a public complaint log is included, if applicable.</p> <p>As required by Condition 62.1, copies of any NSPS and NESHAPs reports are attached, if applicable.</p>	
✓	Seawater Treatment Plant (STP)	AQC Operating Permit No. 271TVP02	4Q 2018 Facility Operating Report
		<p>As required by Condition 5.1.d, copies of the records of fuel gas sulfur content are attached, if applicable.</p> <p>As required by Condition 19.1, copies of visible emission observation results are attached, if applicable.</p> <p>As required by Condition 38.5, a public complaint log is included, if applicable.</p> <p>As required by Condition 58.1, copies of any NSPS and NESHAPs reports are attached, if applicable.</p>	
✓	Crude Oil Topping Plant (COTU)	AQC Operating Permit No. 265TVP02	4Q 2018 Facility Operating Report
		<p>According to Condition 18.7, Method 22 visible emission reports are attached, if applicable.</p> <p>As required by Condition 2.4, copies of visible emission observation (Method 9) results are attached, if applicable.</p> <p>As required by Condition 51, copies of Excess Emissions and Monitoring System Performance Reports are attached, if applicable.</p> <p>As required by Condition 30.4, a public complaint log is included, if applicable.</p> <p>As required by Condition 54.1, copies of any NSPS and NESHAPs reports are attached, if applicable.</p>	
✓	Skid 50 Standby Generator	Owner Requested Limit No. AQ1108ORL01	4Q 2018 Facility Operating Report
		<p>As requested by Condition 2.2, copies of the monthly fuel sulfur analysis are attached.</p> <p>As requested by Condition 4, copies of excess emissions and deviation forms are attached, if applicable.</p>	

<u>Facility</u>	<u>Permit No.</u>	<u>Required Report</u>
Gathering Center # 3 (GC-3)	AQC Operating Permit No. 184TVP01, Revision 1, and AQ0184MSS02, Revision 1 As required by Conditions 5.1.d and 21.3, copies of the records of fuel sulfur content are attached, if applicable. As required by Conditions 24.1, 26.2, 29.3, and 64.3, copies of visible emission observation results are attached, if applicable. As required by Condition 45.5, a public complaint log is included, if applicable. As required by Condition 63.1, copies of any NSPS and NESHAPs reports are attached, if applicable.	4Q 2018 Facility Operating Report
✓ Flow Station #1 (FS-1)	AQC Operating Permit No. 167TVP02 As required by Condition 5.1.d, copies of the records of fuel gas sulfur content are attached, if applicable. As required by Condition 11.1, copies of the records of flue gas content of O <sub>2</sub> are attached, if applicable. As required by Condition 24.1 and 28.4, copies of visible emission observation results are attached, if applicable. As required by Condition 44.5, a public complaint log is included, if applicable. As required by Condition 62.1, copies of any NSPS and NESHAPs reports are attached, if applicable.	4Q 2018 Facility Operating Report
✓ Flow Station #2 (FS-2)	AQC Operating Permit No. 268TVP01 As required by Condition 5.1.d, copies of the records of fuel gas sulfur content are attached, if applicable. As required by Condition 24.1 and 28.4, copies of visible emission observation results are attached, if applicable. As required by Condition 43.5, a public complaint log is included, if applicable. As required by Condition 61.1, copies of any NSPS and NESHAPs reports are attached, if applicable.	4Q 2018 Facility Operating Report
✓ Flow Station #3 (FS-3)	AQC Operating Permit No. 269TVP01 As required by Condition 5.1.d, copies of the records of fuel gas sulfur content are attached, if applicable. As required by Condition 26.1 and 30.4, copies of visible emission observation results are attached, if applicable. As required by Condition 45.5, a public complaint log is included, if applicable. As required by Condition 63.1, copies of any NSPS and NESHAPs reports are attached, if applicable.	4Q 2018 Facility Operating Report
✓ Central Compressor Plant (CCP)	AQC Construction/Operating Permit No. 166TVP01 and 166CPT04 As required by Condition 5.1.d, copies of the records of fuel gas sulfur content are attached, if applicable. As required by Condition 24.1 and 28.4, copies of visible emission observation results are attached, if applicable. As required by Condition 43.5, a public complaint log is included, if applicable. As required by Condition 62.1, copies of any NSPS and NESHAPs reports are attached, if applicable.	4Q 2018 Facility Operating Report.

✓	Grind and Inject (G&I)	AQC Operating Permit No. 0168TVP02 As required by Condition 43.2, copies of excess emissions and/or permit deviations are attached if applicable. As required by Condition 13.1 and 43.3, Method 22 visible emission observations are attached if applicable. As required by Condition 13.4 and 23.4, a public complaint log is attached, if applicable. As required by Condition 45.1, copies of any NSPS and/or NESHAP reports are attached, if applicable.	4Q 2018 Facility Operating Report
✓	Lisburne Production Center (LPC)	AQC Operating Permit No. 272TVP02 As required by Condition 9.4.b, copies of the records of fuel gas sulfur content are attached, if applicable. As required by Condition 4.1.a, 5.4, and 8.2.c, copies of visible emission observation results are attached, if applicable. As required by Condition 59.5, a public complaint log is included, if applicable. As required by Condition 84.1, copies of any NSPS and NESHAPs reports are attached, if applicable.	4Q 2018 Facility Operating Report
✓	Central Power Station	AQC Operating Permit No. 186TVP03, and AQC Construction Permit No. 186CP01 As required by Condition 3.3.b, copies of the records of fuel gas sulfur content are attached, if applicable. As required by Condition 40.5, a public complaint log is attached, if applicable. As required by Condition 29.1, copies of any NSPS and NESHAPs reports are attached, if applicable.	4Q 2018 Facility Operating Report

Laboratory analyses for Prudhoe Bay diesel fuel are included as an additional attachment to each report.

The GTS Bath Heater at Z Pad (Minor Permit No. AQ0183MSS01) did not receive any public complaints during the reporting period. Therefore, an Operating Report is not required.

There was one visible emission observation (Reference Method 9) conducted at GC-1 and one conducted at LPC during the quarter.

Source testing was conducted at FS-1 and FS-2 during the reporting period.

The certification statement required by 18 AAC 50.205 is attached.

If you have any questions regarding this submittal, please contact me at 564-4405.

Sincerely,



Rachel Buckbee  
Air Compliance Advisor

**Certification Statement**  
**[Reference: 18 AAC 50.205]**

Facility Name: Fourth Quarter 2018 Facility Operating Reports GC1, GC2, GC3, CCP, CGF, CPS, FS1, FS2, FS3, LPC, SIP, STP, COTU, Skid 50, GNI

There was one visible emission observation (Reference Method 9) conducted at GC-1 and one conducted at LPC during the quarter.

*"Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete."*



(Responsible Company Official)

2/13/19

Date

Kollin Fencil

Printed Name

Area Operations Manager

Title

BP Exploration (Alaska) Inc.

Company

## **Gathering Center #2**

**BP Exploration (Alaska) Incorporated**  
**Gathering Center # 2**  
**Prudhoe Bay, Alaska**  
**Air Quality Permit Numbers AQ0183TVP01 Revision 3 and AQ0183MSS03 Revision 1**  
**Reporting Period from October 1, 2018 to December 31, 2018**  
**Page 1 of 3**

Group I - Gas-Fired Turbines [TVP01 PC 9.3 & 10.2]				Hours of Operation		
EU ID	Tag Number	Source Description	Rating/Size	October	November	December
1	GTRB-02-7000	GE MS 5382C	38.0 Mhp	604.2	721.0	743.3
2	GTRB-02-7001	GE MS 5382C	38.0 Mhp	653.0	721.0	743.0
3	GTRB-W-3152	Solar Mars	12.6 Mhp	Source Removed from Service		
4	GTRB-02-7704A	Sulzer S3	7.91 Mhp	744.0	718.0	744.0
5	GTRB-02-7704B	Sulzer S3	7.91 Mhp	581.0	720.0	744.0
6	GTRB-02-7529	Ruston TB 5000	4.9 Mhp	707.0	719.0	217.0
7	GTRB-02-7504A	Ruston TA 2500	2.5 Mhp	48.0	0.0	0.0
8	GTRB-02-7504B	Ruston TA 2500	2.5 Mhp	444.0	719.0	555.9
<b>Total Group I Fuel Gas Consumption (MMscf)</b>				<b>608.3</b>	<b>642.6</b>	<b>653.6</b>

Group II - Gas-Fired Heaters [TVP01 PC 9.3 & 10.2]				Hours of Operation on Fuel Gas		
EU ID	Tag Number	Source Description	Rating/Size	October	November	December
9	B-02-7000	CB 200800	33.5 MMBtu/hr	0.0	487.4	727.8
10	B-02-7001	CB 200800	33.5 MMBtu/hr	289.8	237.1	741.1
11	B-02-7002	CB 200800	33.5 MMBtu/hr	86.3	721.0	0.0
12	B-02-0001	CB 200500	20.9 MMBtu/hr	247.0	590.0	545.0
13	B-02-0002	CB 200500	20.9 MMBtu/hr	222.0	1.0	47.0
14	B-02-0003	CB 200500	20.9 MMBtu/hr	545.9	717.0	744.0
15	B-02-0004	CB 200500	20.9 MMBtu/hr	0.2	0.0	0.0
16	B-02-0067	BS&B	7.73 MMBtu/hr	744.0	721.0	744.0
17	B-02-0068	BS&B	7.73 MMBtu/hr	744.0	721.0	744.0
<b>Total Group II Fuel Gas Consumption (MMscf)</b>				<b>35.4</b>	<b>73.5</b>	<b>73.8</b>

<sup>1</sup> Fuel gas consumption includes EU ID 36, per AQ0183MSS01.

Group II - Dual Fuel-Fired Heaters [TVP01 PC 9.3 & 10.2]				Hours of Operation on Diesel					
EU ID	Tag Number	Source Description	Rating/Size	October	12-Month Total	November	12-Month Total	December	12-Month Total
9	B-02-7000	CB 200800	33.5 MMBtu/hr	0.0	0.0	0.0	0.0	0.0	0.0
10	B-02-7001	CB 200800	33.5 MMBtu/hr	0.0	0.0	0.0	0.0	0.0	0.0
11	B-02-7002	CB 200800	33.5 MMBtu/hr	0.0	0.0	0.0	0.0	0.0	0.0
12	B-02-0001	CB 200500	20.9 MMBtu/hr	0.0	0.0	0.0	0.0	0.0	0.0
13	B-02-0002	CB 200500	20.9 MMBtu/hr	0.0	0.0	0.0	0.0	0.0	0.0
14	B-02-0003	CB 200500	20.9 MMBtu/hr	0.0	0.0	0.0	0.0	0.0	0.0
15	B-02-0004	CB 200500	20.9 MMBtu/hr	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total Group II Diesel Consumption (gallons)</b>				<b>0.0</b>		<b>0.0</b>		<b>0.0</b>	

Group III - Diesel Engines [TVP01 PC 8.2, 9.3, 10.2 & MSS03 PC 8.1b]				Hours of Operation					
EU ID	Tag Number	Source Description	Rating/Size	October	12-Month Total	November	12-Month Total	December	12-Month Total
18	GNED-02-0001	Detroit Diesel	737.6 hp	0.7	19.8	1.0	20.7	4.3	23.6
19	GNED-02-0002	Detroit Diesel	737.6 hp	0.5	21.9	0.0	21.9	4.8	26.0
20	GNED-02-0011	Detroit Diesel	737.6 hp	1.2	12.4	1.1	13.6	1.8	15.3
21	PED-02-0049	Detroit Diesel	280 hp	1.0	13.6	1.3	14.9	1.6	13.9
22	PED-02-7004	Detroit Diesel	280 hp	1.0	14.0	2.0	16.0	1.0	14.0
23	GNED-02-7500	Detroit Diesel	3,600 hp	0.4	14.2	0.4	13.3	0.8	13.0
24	GTRB-02-8001	Alison Turbine	5,000 hp	0.0	4.7	0.0	4.7	0.0	4.7
<b>Total Group III Diesel Consumption (gallons)</b>				<b>192.9</b>		<b>206.7</b>		<b>604.1</b>	

Group IV - Flares [TVP01 PC 10.2]				October	November	December
<b>Total Group IV Flared Gas (MMscf)</b>				<b>28.7</b>	<b>29.6</b>	<b>33.2</b>

Total Facility Consumption [TVP01 PC 10.2]				October	November	December
<b>Fuel Gas Consumption &amp; Flared Gas Volume (MMscf)</b>				<b>672</b>	<b>746</b>	<b>761</b>
<b>Diesel Fuel Consumption (gallons)</b>				<b>193</b>	<b>207</b>	<b>604</b>

Fuel Quality [TVP01 PC 6.1d, 6.2a, 11.2, 22.3c, MSS03 6.1, 7.1b, 7.2d & 9.1]				October	November	December
<b>Fuel Gas H<sub>2</sub>S Content (ppmv)<sup>1</sup></b>				<b>31</b>	<b>28</b>	<b>27</b>
<b>Rolling 12-Month Average H<sub>2</sub>S Content (ppmv)</b>				<b>29</b>	<b>29</b>	<b>29</b>
<b>Diesel Fuel Sulfur Content (wt. % S)<sup>2</sup></b>				<b>0.081</b>	<b>0.078</b>	<b>0.078</b>

<sup>1</sup> ASTM D4810-88

<sup>2</sup> ASTM D4294, see attached COTU laboratory analysis data sheets.

**BP Exploration (Alaska) Incorporated**  
**Gathering Center # 2**  
**Prudhoe Bay, Alaska**  
**Air Quality Permit Numbers AQ0183TVP01 Revision 3 and AQ0183MSS03 Revision 1**  
**Reporting Period from October 1, 2018 to December 31, 2018**  
**Page 2 of 3**

Facility Emissions (TVP01 PC 6.2, 7.2 & MSS03 PC 9.1)				Emissions (tons)					
EU ID	Tag Number	Pollutant	12-Month Total Limit	October	12-Month Total	November	12-Month Total	December	12-Month Total
1	GTRB-02-7000	NO <sub>x</sub>	1,053 (combined) <sup>1</sup>	30.7	373.1	33.6	376.6	35.8	380.0
		CO	No Limit	1.2	14.4	1.3	14.4	1.4	14.6
		VOC	8.9 (combined) <sup>1</sup>	0.2	3.0	0.3	3.0	0.3	3.1
2	GTRB-02-7001	NO <sub>x</sub>	1,053 (combined) <sup>1</sup>	33.2	354.0	33.6	356.6	35.8	360.8
		CO	No Limit	1.3	13.6	1.3	13.7	1.4	13.9
		VOC	8.9 (combined) <sup>1</sup>	0.3	2.9	0.3	2.9	0.3	2.9
3	GTRB-W-3152	NO <sub>x</sub>	Source Removed from Service						
		CO							
		PM							
		SO <sub>2</sub>							
4	GTRB-02-7704A	NO <sub>x</sub>	230	10.3	130.9	9.3	126.0	9.9	126.0
		CO	58	2.1	16.1	1.9	17.6	2.0	18.2
		PM	4.6	0.3	3.3	0.2	3.2	0.3	3.2
		NO <sub>x</sub>	230	7.2	112.0	10.1	111.1	11.0	116.3
5	GTRB-02-7704B	CO	56	0.2	9.8	0.3	9.8	0.4	9.9
		PM	4.6	0.2	2.7	0.2	2.7	0.2	2.8
		SO <sub>2</sub>	1.5	0.06	1.06	0.08	1.06	0.08	1.09
		NO <sub>x</sub>	141	4.3	42.2	4.0	42.5	1.3	40.0
6	GTRB-02-7529	CO	38	0.6	6.6	0.5	6.6	0.2	6.2
		PM	3.2	0.2	2.3	0.2	2.3	0.1	2.2
		NO <sub>x</sub>	86	0.3	22.2	0.0	20.4	0.0	14.4
		CO	24	0.0	2.0	0.0	2.0	0.0	1.9
7	GTRB-02-7504A	PM	2.0	0.0	0.7	0.0	0.7	0.0	0.6
		NO <sub>x</sub>	86	2.5	28.2	3.7	27.0	3.0	28.4
		CO	24	0.1	2.7	0.2	2.8	0.2	2.7
		PM	2.0	0.1	1.0	0.1	1.0	0.1	1.0
8	GTRB-02-7504B	NO <sub>x</sub>	21	0.0	9.3	1.0	10.3	1.5	10.6
		CO	5.1	0.0	2.6	0.3	2.8	0.4	2.9
		PM	1.6	0.0	0.6	0.1	0.6	0.1	0.6
		NO <sub>x</sub>	21	0.6	4.8	0.5	3.9	1.6	5.3
9	B-02-7000	CO	5.1	0.2	1.3	0.1	1.1	0.4	1.4
		PM	1.6	0.0	0.3	0.0	0.2	0.1	0.3
		NO <sub>x</sub>	21	0.2	9.2	1.5	9.4	0.0	8.0
		CO	5.1	0.1	2.6	0.4	2.6	0.0	2.1
10	B-02-7001	PM	1.6	0.0	0.6	0.1	0.6	0.0	0.6
		NO <sub>x</sub>	21	0.2	9.2	1.5	9.4	0.0	8.0
		CO	5.1	0.1	2.6	0.4	2.6	0.0	2.1
		PM	1.6	0.0	0.6	0.1	0.6	0.0	0.6
11	B-02-7002	NO <sub>x</sub>	21	0.2	9.2	1.5	9.4	0.0	8.0
		CO	5.1	0.1	2.6	0.4	2.6	0.0	2.1
		PM	1.6	0.0	0.6	0.1	0.6	0.0	0.6
		NO <sub>x</sub>	21	0.2	9.2	1.5	9.4	0.0	8.0

<sup>1</sup> Emission limits for EU IDs 1 and 2 are combined 12-month total emissions.

**Total Facility SO<sub>2</sub> Emissions from Fuel Gas Combustion (tons per month) (MSS03 PC 12.1a)**

January	February	March	April	May	June
1.93	1.42	1.68	1.71	2.03	2.05
July	August	September	October	November	December
6.01	1.44	1.46	1.73	1.74	1.72

<b>Total SO<sub>2</sub> Emissions from Fuel Gas Combustion (tons per calendar year)</b>	<b>25.1</b>
<b>Net Change in SO<sub>2</sub> Emissions (tons) (MSS03 PC 12.1b)</b>	<b>11.1</b>



**Additional information**

1) Monthly fuel sulfur records are listed below [TVP01 PC 5 1d, 22 3c MSS03 PC 6 1 & 7 2d]

October						
Date Sample	Sample Facility	Sample Description	Sample Point	Meter Number	Analysis Method	Analysis Result (ppmv)
10/1/2018	GC-2	GC2 Fuel Gas Reg Sple Pt	MEL# SC-02-49501M	5000	H2S, ASTM D4810-88	30
10/10/2018	GC-2	GC2 Fuel Gas Reg Sple Pt	MEL# SC-02-49501M	5000	H2S, ASTM D4810-88	35
10/15/2018	GC-2	GC2 Fuel Gas Reg Sple Pt	MEL# SC-02-49501M	5000	H2S, ASTM D4810-88	28
10/23/2018	GC-2	GC2 Fuel Gas Reg Sple Pt	MEL# SC-02-49501M	5000	H2S, ASTM D4810-88	29

November						
Date Sample	Sample Facility	Sample Description	Sample Point	Meter Number	Analysis Method	Analysis Result (ppmv)
11/5/2018	GC-2	GC2 Fuel Gas Reg Sple Pt	MEL# SC-02-49501M	5000	H2S, ASTM D4810-88	25
11/12/2018	GC-2	GC2 Fuel Gas Reg Sple Pt	MEL# SC-02-49501M	5000	H2S, ASTM D4810-88	26
11/20/2018	GC-2	GC2 Fuel Gas Reg Sple Pt	MEL# SC-02-49501M	5000	H2S, ASTM D4810-88	28
11/25/2018	GC-2	GC2 Fuel Gas Reg Sple Pt	MEL# SC-02-49501M	5000	H2S, ASTM D4810-88	32

December						
Date Sample	Sample Facility	Sample Description	Sample Point	Meter Number	Analysis Method	Analysis Result (ppmv)
12/1/2018	GC-2	GC2 Fuel Gas Reg Sple Pt	MEL# SC-02-49501M	5000	H2S, ASTM D4810-88	30
12/11/2018	GC-2	GC2 Fuel Gas Reg Sple Pt	MEL# SC-02-49501M	5000	H2S, ASTM D4810-88	24
12/17/2018	GC-2	GC2 Fuel Gas Reg Sple Pt	MEL# SC-02-49501M	5000	H2S, ASTM D4810-88	26
12/24/2018	GC-2	GC2 Fuel Gas Reg Sple Pt	MEL# SC-02-49501M	5000	H2S, ASTM D4810-88	26
12/29/2018	GC-2	GC2 Fuel Gas Reg Sple Pt	MEL# SC-02-49501M	5000	H2S, ASTM D4810-88	28

2) No excess emissions were discovered during the reporting period [TVP01 PC 65 2]

Discovery Date	Date Submitted to ADEC	EU ID
N/A	N/A	N/A

3) No permit deviations were discovered during the reporting period [TVP01 PC 65 2]

Discovery Date	Date Submitted to ADEC	EU ID
N/A	N/A	N/A

4) No Method 9 observations were conducted during the reporting period [TVP01 PC 25 1, 27 2a, 27 2c, 30 3a, 30 3c, MSS03 PC 4 1 & 5 1]

EU ID	Number of Observations Days	Highest 6-min Average	Dates when Results Exceeded 20%	Required Monitoring or Recordkeeping Not Completed
N/A	N/A	N/A	N/A	N/A

5) No source test were conducted during the reporting period [TVP01 PC 21 6a, 21 6b, 27 2b, 30 3b, MSS03 PC 5 1]

6) No public complaints were received during the reporting period [TVP01 PC 46 5]

Number of Complaints Received	Number of Times Corrective Action was Necessary	Number of Times Actions were Taken within 24 Hours	Status of Necessary Corrective Actions Not Taken within 24 Hours
0	0	N/A	N/A

7) Copies of Excess Emissions and Monitoring Systems Performance reports are provided to ADEC upon submittal to the U.S. EPA

Copies of any NSPS and NESHAPs reports submitted to the U.S. EPA during the reporting period are attached, if applicable. [TVP01 PC 64 1]

8) No sources listed as insignificant under 18 AAC 50.326(e) had emissions greater than the significant thresholds in 18 AAC 50.326(e) during the reporting period [TVP01 PC 34 3]

9) The diesel sulfur content did not exceed 0.75% by weight during the reporting period. Therefore, SO<sub>2</sub> emissions for EU IDs 9 through 15 and 18 through 24 are not included. [TVP01 PC 5 2d]

10) GC-2 has completed the six daylight flare observations required by the permit. All flare information is recorded below. [TVP01 PC 31.3, 31.4 MSS03 4 1 & 5 1]

EU ID	Date	Start Time	End Time	Cumulative Flared Gas Volume (MMacf)	Reason for Flaring
27	5/9/2004-5/10/2004	21:10	00:50	0.364	K-7000 Turbine Water Wash
27	5/16/2004	09:20	12:50	0.364	K-7001 Turbine Water Wash
27	8/12/2004	20:00	21:08	0.082	Full plant shut-down for maintenance
27	8/7/2004-9/11/04	18:30	22:35	43.7	Start-up
27	7/10/2004	05:22	08:36	0.333	ESD Testing
27	9/3/2005	8:05	10:00	0.491	ESD Testing

11) The exhaust stack diameters for EU IDs 18 through 20 are 11.8 inches and the diameters for EU IDs 21 through 24 are 3.9 inches, 5.9 inches, 18.1 inches and 47.2 inches, respectively [TVP01 PC 29]

12) No source testing or visible emission monitoring triggered additional testing or monitoring [TVP01 PC 65 3]

Date Additional Testing or Monitoring was Triggered	Equipment Involved	Permit Condition Affected	Result which Triggered Additional Testing or Monitoring
N/A	N/A	N/A	N/A

13) There were no known Subpart ZZZZ deviations during the reporting period. [40 CFR 63.6850(f)]

# **GPB LABORATORY REPORT**

907-659-5654

AKOPSLabIntertek@bp.com

## **Sample Information**

Sample ID Number: PD52733  
Sample Facility: COTU  
Collection Date/Time: 10/9/2018  
Sample Point: COTU Sales Diesel Tank  
Sample Description: Sales Diesel  
Sample Type: Diesel

## **Results**

<u>Analysis Name</u>	<u>Result</u>	<u>Units</u>
Sulfur	0.0808	Wt%

## **GPB LABORATORY REPORT**

907-659-5654

AKOPSLabIntertek@bp.com

### **Sample Information**

Sample ID Number: PD53549  
Sample Facility: COTU  
Collection Date/Time: 11/10/2018  
Sample Point: COTU Sales Diesel Tank  
Sample Description: Sales Diesel  
Sample Type: Diesel

### **Results**

<u>Analysis Name</u>	<u>Result</u>	<u>Units</u>
Sulfur	0.0784	Wt%

## **GPB LABORATORY REPORT**

907-659-5654

AKOPSLabIntertek@bp.com

### **Sample Information**

Sample ID Number: PD54262  
Sample Facility: COTU  
Collection Date/Time: 12/9/2018  
Sample Point: COTU Sales Diesel Tank  
Sample Description: Sales Diesel  
Sample Type: Diesel

### **Results**

<u>Analysis Name</u>	<u>Result</u>	<u>Units</u>
Sulfur	0.0781	Wt%